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Sincerely yours,  
*Michele Barney*  
Michele Barney  
Site Director, BASF Elyria

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PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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<p><b>Michele Barney</b> <b>BASF Corporation</b> <b>120 Pine Street</b> <b>Elyria, OH 44035</b></p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <span style="float: right;"><input type="checkbox"/> Priority Mail Express®</span></p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <span style="float: right;"><input type="checkbox"/> Registered Mail™</span></p> <p><input type="checkbox"/> Certified Mail® <span style="float: right;"><input type="checkbox"/> Registered Mail Restricted Delivery</span></p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <span style="float: right;"><input checked="" type="checkbox"/> Return Receipt for Merchandise</span></p> <p><input type="checkbox"/> Collect on Delivery <span style="float: right;"><input type="checkbox"/> Signature Confirmation™</span></p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <span style="float: right;"><input type="checkbox"/> Signature Confirmation Restricted Delivery</span></p> <p><input type="checkbox"/> Insured Mail <span style="float: right;"><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</span></p>	
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Enclosures

Michele Barney  
Site Director, BASF Elyria

Sincerely yours,  
Michele Barney

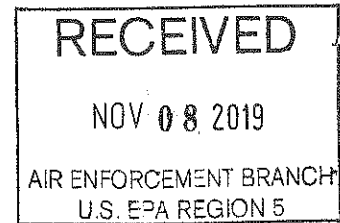


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October 31, 2019

**Sent by Certified Mail**

Attention: Compliance Tracker (AE-18J)  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency, Region V  
77 W. Jackson Blvd.  
Chicago, Illinois 60604



**Subject: BASF Corporation, Elyria, Ohio  
Facility ID 0247040195, Permit Number P0125035  
3rd Quarter 2019 Title V Reporting**

Dear Sir / Madam:

BASF Corporation hereby submits required Title V compliance reports for the period July 1, 2019 to September 30, 2019, as required pursuant to item 47 of Administrative Order EPA-5-18-113(a)-OH-06.

47. BASF must send all deviation, malfunction, and compliance reports required by BASF's current Title V operating permit or any other effective CAA Permits applicable to the facility, covering any activity during the dates this order is in effect, to EPA under Section 114(a)(1) of the CAA, 42 U.S.C. Section 7414(a)(1), to the following address:

Attention: Compliance Tracker (AE-18J)  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency, Region V  
77 W. Jackson Blvd.  
Chicago, Illinois 60604

Enclosed are the following documents - Title V Deviation Reports for 3Q 2019, Excess Emissions and Continuous Monitoring System (CMS) Performance Report and/or Summary Reports for Q3 2019, and one malfunction report from 3Q 2019.

Based on available information and belief formed after reasonable inquiry, the undersigned certifies that the statements and information in this report are true, accurate, and complete. Please contact Nancy Gallagher at (440) 329-2427 if you have any questions concerning this report submittal.



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Sincerely yours,

A handwritten signature in cursive script that reads "Michele Barney".

Michele Barney  
Site Director, BASF Elyria

Enclosures

## **Excess Emissions and Continuous Monitoring System (CMS) Performance Report and/or Summary Report**

Applicable Rule: 40 CFR Part 63, Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A — General Provisions. Excess emissions and CMS performance report and/or summary report is being made in accordance with §63.10(e)(3).

*Excess emissions and parameter monitoring exceedances are defined in relevant standards. The owner or operator of an affected source required to install a CMS by a relevant standard shall submit an excess emissions and CMS performance report and/or a summary report to the Administrator semiannually, except when*

- a. More frequent reporting is specifically required by a relevant standard;*
- b. The Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or*
- c. The CMS data are to be used directly for compliance determination and the source experienced excess emissions, in which case quarterly reports shall be submitted. Once a source reports excess emissions, the source shall follow a quarterly reporting format until a §63.10(e)(3)(ii) request to reduce frequency of excess emissions and CMS performance reports is approved. (§63.10(e)(3)(i)(A)-(C))*

*All excess emissions and monitoring system performance reports and all summary reports, if required, shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. (§63.10(e)(3)(v))*

*If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and CMS performance report need not be submitted unless required by the Administrator. (§63.10(e)(3)(vii))*

*If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and CMS performance report shall be submitted. (§63.10(e)(3)(viii))*

*Notwithstanding the frequency of reporting requirements specified in §63.10(e)(3)(i), an owner or operator who is required by a relevant standard to submit excess emissions and CMS performance (and summary) reports on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:*

- a. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods) the affected source's excess emissions and CMS performance reports continually demonstrate that the source is in compliance with the relevant standard;*
- b. The owner or operator continues to comply with all recordkeeping and monitoring requirements specified in this subpart and the relevant standard; and*
- c. The Administrator does not object to a reduced frequency of reporting for the affected source, as provided in §63.10(e)(3)(iii). (§63.10(e)(3)(ii)(A)-(C))*

*The frequency of reporting of excess emissions and CMS performance (and summary) reports required to comply with a relevant standard may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source's entire previous performance history during the 5-year recordkeeping period prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator's conformance with operation and maintenance requirements. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce the frequency of reporting, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted. (§63.10(e)(3)(iii))*

*As soon as the CMS data indicate that the source is not in compliance with any emission limitation or operating parameter specified in the relevant standard, the frequency of reporting shall revert to the frequency specified in the relevant standard, and the owner or operator shall submit an excess emissions and CMS performance (and summary) report for the noncomplying emission points at the next appropriate reporting period following the noncomplying event. After demonstrating ongoing compliance with the relevant standard for another full year, the owner or operator may again request approval from the Administrator to reduce the frequency of reporting for that standard, as provided for in §63.10(e)(3)(ii) and §63.10(e)(3)(iii). (§63.10(e)(3)(iv))*

**SECTION I  
GENERAL INFORMATION**

A. Print or type the following information for each facility for which you are submitting an excess emissions and CMS performance report and/or summary report (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)		Facility I.D. Number (OPTIONAL)	
P0125035		0247040195	
Responsible Official's Name/Title			
Michele Barney			
Street Address			
120 Pine Street			
City	State	ZIP Code	
Elyria	OH	44035	
Facility Name (if different from Responsible Official's Name)			
BASF Corporation			
Facility Street Address (If different than Responsible Official's Street Address)			
Facility Local Contact Name		Title	Phone (OPTIONAL)
Nancy Gallagher		Sr. EHS Specialist	
City	State	ZIP Code	
Elyria	OH	44035	

B. Indicate the relevant standard(s) or other requirement(s) that is/are the basis for this report. (§63.5(d)(1)(ii)(D))

Basis for this report ( <i>relevant standards or other requirements</i> )
40 CFR 60.7 and 60.16(h)

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this excess emissions and CMS performance report and/or summary report? (§63.10(f)(3))

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this excess emissions and CMS performance report and/or summary report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping and/or reporting is warranted. (§63.10(f)(3))

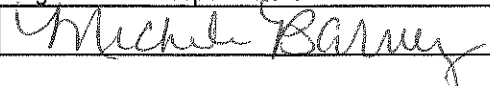
D. Check the box that corresponds to the report(s) you are submitting:

- ☐ Summary Report Only (**Complete Sections II and IV**)
- ☒ Excess Emission and CMS Performance Report and Summary Report (**Complete Sections II, III, and IV**)

## SECTION II

### CERTIFICATION *(Note: you may edit the text in this section as deemed appropriate)*

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Michele Barney	Site Director	10/31/19
Signature of Responsible Official		
		

## SECTION III

### EXCESS EMISSIONS AND CMS PERFORMANCE REPORT

#### A. Excess Emissions

1. Have any excess emissions or exceedances of a parameter occurred during this reporting period? Yes ☒ No ☐ *(if no, go to B.1.)* (§63.10(e)(3)(v))
2. If you answered yes, complete the following table **for each period** of excess emissions and/or parameter monitoring exceedances, as defined in the relevant standard(s), that occurred **during** startups, shutdowns, and/or malfunctions of your affected source, **or during periods other than** startups, shutdowns, and/or malfunctions of your affected source. (§63.10(c)(7)-(11))





## B. CMS Performance

1. Has a CMS been inoperative (except for zero/low-level and high-level checks), out of control (as defined in §63.8(c)(7)(i)), repaired, or adjusted during this reporting period? ☒ Yes ☐ No *(if no, go to B.3.)* (§63.10(e)(3)(v))

*Note: A CMS is out of control if (a) the zero (low-level), mid-level (if applicable), or high-level calibration drift (CD) exceeds two times the applicable CD specification in the applicable performance specification or in the relevant standard; or (b) the CMS fails a performance test audit (e.g., cylinder gas audit), relative accuracy audit, relative accuracy test audit, or linearity test audit; or (c) the COMMS CD exceeds two times the limit in the applicable performance specification in the relevant standard. (§63.8(c)(7)(i))*

*When the CMS is out of control, the owner or operator of the affected source shall take the necessary corrective action and shall repeat all necessary tests which indicate that the system is out-of-control. The owner or operator shall take corrective action and conduct retesting until the performance requirements are below the applicable limits. The beginning of the out-of-control period is the hour the owner or operator conducts a performance check (e.g., calibration drift) that indicates an exceedance of the performance requirements established under this part. The end of the out-of-control period is the hour following the completion of corrective action and successful demonstration that the system is within the allowable limits. During the period the CMS is out-of-control, recorded data shall not be used in data averages and calculations, or to meet any data availability requirement established under this part. (§63.8(c)(7)(ii))*

2. If you answered yes, complete the following table **for each period** a CMS was out of control, repaired, or adjusted: (§63.10(c)(5)-(6), (10)-(12); §63.8(c)(8))

*Note: Use a separate line for each period a CMS was out of control, repaired, or adjusted.*

CMS Type	Manufacturer	Process ID Number	Start Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	Nature and Cause of Any Malfunction (if known)	Corrective Action Taken or Preventive Measures Adopted	Nature of the Repairs or Adjustments Made to the CMS that was Inoperative or Out of Control
GP-IR	Rosemount Analytical	P102, P103, P009, P092	07/01/2019	07/01/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092	07/03/2019	07/03/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification. Note that all sources were shut down for all or part of 2 shifts.	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103,	7/11/2019	7/11/2019	Respond to results of daily automatic calibration	Recalibrate analyzer, adjust sample flow, run auto-	CMS out of control for 30.21 hours.

GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/25/2019	07/25/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification. Note that all sources were shut down for 2 shifts.	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/26/2019	07/26/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification.	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/27/2019	07/27/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/29/2019	07/30/2019	Respond to results of daily automatic calibration failure, out of control on span	Recalibrate analyzer, adjust sample flow, run auto-verification. Note that all sources were shut down for all or part of 1 shift.	CMS out of control for 31 hours.
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/30/2019	07/30/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification. Capped off verification cabinet rotometer.	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/31/2019	07/31/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification. Calibration gas low, replaced.	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	08/19/2019	08/19/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount	P102,	08/20/2019	08/20/2019	Respond to results of daily	Recalibrate analyzer, adjust	N/A (CMS operative and in

		P009, P092			failure	verification	
GP-IR	Rosemount Analytical	P102, P103, P009, P092	07/16/2019	07/16/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/19/2019	07/19/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/20/2019	07/20/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/21/2019	07/21/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/22/2019	07/22/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/23/2019	07/23/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	07/24/2019	07/24/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification. Note that all sources were shut down for 2 shifts.	N/A (CMS operative and in control)

	Analytical	P103, P009, P092, P026			automatic calibration failure	sample flow, run auto-verification. Replaced cylinder.	control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	08/21/2019	08/21/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	08/22/2019	08/22/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	08/23/2019	08/23/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification. Replaced tubing and fittings.	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	08/24/2019	08/24/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	08/25/2019	08/25/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	08/26/2019	08/26/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto-verification. Changed cylinder.	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009,	09/03/2019	09/03/2019	Respond to results of daily automatic calibration	Recalibrate analyzer, adjust sample flow, run auto-verification. Changed	N/A (CMS operative and in control)

		P092, P026			failure	cylinder.	
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	09/04/2019	09/04/2019	Respond to results of daily automatic calibration failure	Recalibrate analyzer, adjust sample flow, run auto- verification. Changed cylinder.	N/A (CMS operative and in control)
GP-IR	Rosemount Analytical	P102, P103, P009, P092, P026	09/12/2019	09/12/2019	General system maintenance	Install stainless steel tubing and fittings in the analyzer cabinet, reconfigure to minimize potential leak points.	N/A (CMS operative and in control)

3. Indicate the total process operating time during the reporting period. (§63.10(c)(13))

Total process operating time (days)

83 (includes partial days – any day on which processing occurred)

#### SECTION IV

#### SUMMARY REPORT- GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

*Note: One summary report shall be submitted for the hazardous air pollutants monitored at each affected source (unless the relevant standard specifies that more than one summary report is required, e.g., one summary report for each hazardous air pollutant monitored). (§63.10(e)(3)(vi))*

##### A. Report Date and Submittal Reporting Period

Indicate the reporting period covered by this submittal and the date of this summary report.  
(§63.10(e)(3)(vi)(C), (M))

Reporting period beginning date (mm/dd/yyyy)	Reporting period ending date (mm/dd/yyyy)	Summary report date (mm/dd/yyyy)
07/01/2019	09/30/2019	10/30/2019

##### B. Process Description and Monitoring Equipment Information

Complete the following process description and monitoring equipment information table **for each affected source process unit**. (§63.10(e)(3)(vi)(B), (D), (E), (F), (G), (H))

Total operating time of affected source during the reporting period (Hours)

719 hours

Process unit name

Rotary Calciners #2, #3, #4, #6 and General Catalyst Blender (E-30)

Process unit description

Rotary calciners and double cone blender for metals-based catalyst production.

Emission and/or operating parameter limitations specified in the relevant standard(s)

1.86 pounds/hour (200 ppmvd)

##### Monitoring Equipment Information

Type	Latest Certification or Audit Date (mm/dd/yyyy)	Manufacturer	Model	HAPs Monitored
GP-IR	09/20/2019	Rosemount Analytical	X-Stream	NOx

### C. Emission Data Summary

Complete the following emission data summary table *for each affected source*:  
(§63.10(e)(3)(vi)(I))

Total duration of excess emissions/parameter exceedances (minutes for opacity, hours for gases): NA

Opacity (minutes): 0	Gases (hours): 0
Total operating time of affected source during the reporting period (days)	
83 (includes partial days – any day on which processing occurred)	
Percent of total source operating time during which excess emissions/parameter exceedances occurred (percent)	
0	
Summary of causes of excess emissions/parameter exceedances (percent of total duration by cause)	
Startup/shutdown	%
Control equipment problems	%
Process problems	%
Other known causes	%
Other unknown causes	%
TOTAL	%
Total NOx Emissions for the Quarter (tons)	.04

### D. CMS Performance Summary

Complete the following CMS performance summary table *for each affected source*:  
(§63.10(e)(3)(vi)(J))

Total duration of CMS downtime (minutes for opacity, hours for gases): P009, P092, P102, P103, P026

Opacity (minutes): 0	Gases (hours): 0
Total operating time of affected source during the reporting period (days)	
83 (includes partial days – any day on which processing occurred)	
Percent of total source operating time during which CMS were down (percent)	
0	
Summary of causes of CMS downtime (percent of downtime by cause)	
Monitoring equipment malfunctions	0%
Non-monitoring equipment malfunctions	0%
Quality assurance/quality control calibrations	0%
Other known causes	0%
Other unknown causes	0%
TOTAL	0%

When CMS is off line, sources do not operate.



**E. CMS, Process, or Control Changes**

1. Have you made any changes in CMS, processes, or controls since the last reporting period? ☒ Yes ☐ No **(if no, end of form)** (§63.10(e)(3)(vi)(K))
2. If you answered yes, please describe the changes below:

Changes in CMS, processes, or controls since the last reporting period

CMS system had small leak that could not be identified. Multiple system components (tubing, fittings) were replaced after analysis of likely leak points. Daily automatic calibration issues would resolve for periods, then return. Calibration gas usage was also increased. On August 23, all tubing and fittings were replaced in kind. The site was already pursuing and decided to execute a change to stainless steel for tubing and fittings to prevent undiagnosable leaks in the future. This change was completed on 9/12/19. Daily automatic calibration checks have continued successfully, supporting the conclusion that one of the fittings or sections of tubing had a leak.

**END OF FORM - Please make sure that a Responsible Official signs Section II prior to submitting the form to your EPA Regional Office or your State Air Permitting Agency, as applicable.**

FACILITY NAME: BASF Corp.			
FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
FACILITY ADDRESS: 120 Pine Street, Elyria, OH 44035			
Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period (please indicate aN/A@ below in the aFrom@ and aTo@ fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Total pages in <u>report</u> , including this one: 11 pages			
Please list any supporting attachments: Q32019Wonderwaredata			
Reporting deadline: 10/31/19			

NOTE: The deviation reporting period shall be stated in the following format: Axx/xx/xx through zz/zz/zz@ where xx/xx/xx and zz/zz/zz are the beginning and end dates for the deviation reporting period respectively.

SIGNATURE FOR STATEMENT

This statement shall be signed by the responsible official as defined in OAC rule 3745-77-01(GG). Making of any false material statement, representation or certification constitutes a violation of ORC 3704.05(H), and subjects the responsible party signing this statement to civil and/or criminal penalties as provided in ORC 3704.06(C) and ORC 3704.

CERTIFICATION

Based on information and belief formed after reasonable inquiry, I hereby affirm, as stated in OAC rule 3745-77-03(D), that the statements and information as transmitted in this Title V report are true, accurate and complete to the best of my knowledge.

Authorized Signature Michele Barney Date 10-31-19  
Name (Please Print) Michele Barney Title Site Director

FACILITY NAME: BASF Corp.			
FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
FACILITY ADDRESS: 120 Pine Street, Elyria, OH 44035			
Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period (please indicate "N/A" below in the "From" and "To" fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

SECTION I - **PART I General Terms and Conditions (Permit Requirement Reporting) (Table1)**

Mark the following box with an >X= if no General Terms and Conditions deviations occurred

<b>X</b>	<b>THERE WERE NO DEVIATIONS OF ANY OF THE TERMS AND CONDITIONS OF PART I OF THE TITLE V PERMIT DURING THE REPORTING PERIOD</b>
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Add rows as necessary to the following table for reported deviations (one for each General Term as applicable; see detailed instructions for more information) **(Table2)**

TITLE V PERMIT TERM NO./Description	Reporting Requirement (choose one)		ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION INFORMATION		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	
	Quarterly	Semi- Annual		DEVIATION DURATION				DESCRIPTION AND MAGNITUDE OF THE DEVIATION
				DATE / TIME START	DATE / TIME END			

FACILITY NAME: BASF Corp.			
FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
FACILITY ADDRESS: 120 Pine Street, Elyria, OH 44035			
Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period (please indicate ΔN/AΔ below in the ΔFromΔ and ΔToΔ fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

**Section II - Part II Facility-wide Permit Requirement Reporting**

**Insignificant Emissions Unit Negative Declarations (Table1)**

List each insignificant emissions unit where no deviations of any PTI terms or applicable requirements for the listed emissions unit occurred, or add rows as necessary to the deviation reporting table (see next page) for reported deviations (one for each term as applicable; see detailed instructions for more information)

<b>THERE WERE NO DEVIATIONS OF <u>ANY</u> PTI TERMS OR APPLICABLE REQUIREMENTS FOR THE FOLLOWING LISTED INSIGNIFICANT EMISSIONS UNITS IDENTIFIED IN PART II.A OF THE TITLE V PERMIT:</b>
P005 – Tunnel Kiln 4
P024 – General Catalyst Reaction Tank
P027 – General Catalyst Mixer 1
P028 – General Catalyst Extruder 1
P031 – Mills and Blender Bldg. 10
P049 – HC-11 tanks
P050 – Misc. Mix Room Equipment
P051 – Misc. Mix Room Blenders
P055 – Zinc Catalyst Tablet Mix
P081 – Nitric Acid Dilution
P082 – Harrop Kiln
P084 – Ammonia Stripper in WWTP

FACILITY NAME: BASF Corp.			
FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
FACILITY ADDRESS: 120 Pine Street, Elyria, OH 44035			
Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period (please indicate <u>NA/NA</u> below in the <u>From</u> and <u>To</u> fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

THERE WERE NO DEVIATIONS OF <u>ANY</u> PTI TERMS OR APPLICABLE REQUIREMENTS FOR THE FOLLOWING LISTED INSIGNIFICANT EMISSIONS UNITS IDENTIFIED IN PART II.A OF THE TITLE V PERMIT:	
P090/P123 – reduction towers	
P096 – Horne tableting machines	
P098 – Clean Room Tableting Bldg. 25	
P100 – Tunnel Kiln 2	
P101 – Tunnel Kiln 3	
P110 – General Catalyst Mixer 3	
P111- East Pfaudler General Catalyst	
P115 – General Catalyst Extruder 2	
P116 – General Catalyst Extruder 3	
P118 – Bldg. 24 Briquettor	
P119 – Bldg. 24 Blender	
P127 – Bldg. 13 Tableting	
P128 – Diesel Emergency Generator	
P138 - Bldg. 10 Repack Area	
P138 – Abbe Blender	

FACILITY NAME: BASF Corp.			
FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
FACILITY ADDRESS: 120 Pine Street, Elyria, OH 44035			
Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period (please indicate "N/A" below in the "From" and "To" fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

THERE WERE NO DEVIATIONS OF <u>ANY</u> PTI TERMS OR APPLICABLE REQUIREMENTS FOR THE FOLLOWING LISTED INSIGNIFICANT EMISSIONS UNITS IDENTIFIED IN PART II.A OF THE TITLE V PERMIT:	
P140 – General Catalyst Mixer 2	
P141 – Reduction Tower Screeners	
P142 – Powder Room Compactor	
P143 – General Catalyst Repack	
B007 – Kewanee Boiler, rated at 8.6 MMbtu / hr	
B008 – Kewanee Boiler, rated at 8.6 MMbtu / hr	
B009 – Kewanee Boiler, rated at 8.6 MMbtu / hr	
B010 – Kewanee Boiler, rated at 8.6 MMbtu / hr	
T001 – sulfuric acid storage tank	

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FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
FACILITY ADDRESS: 120 Pine Street, Elyria, OH 44035			
Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
<b>QUARTERLY</b> Reporting Period		<b>SEMIANNUAL</b> Reporting Period (please indicate <b>NA/NA</b> below in the <b>From</b> and <b>To</b> fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

X	THERE WERE NO DEVIATIONS OF ANY OF THE TERMS AND CONDITIONS OF PART II OF THE TITLE V PERMIT DURING THE REPORTING PERIOD SPECIFIED IN THIS REPORT
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Add rows as necessary to the following table for reported deviations (one for each Term as applicable; see detailed instructions for more information)

[illegible]

FACILITY NAME: BASF Corp.			
FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
FACILITY ADDRESS: 120 Pine Street, Elyria, OH 44035			
Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period (please indicate "N/A" below in the "From" and "To" fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

Section III - Part III Emissions Unit Terms and Conditions (Permit Requirement Reporting) - Negative Declarations (Table 1)

List each emissions unit where no deviations of any terms for the listed emissions unit occurred, or add rows as necessary to the second table (see next page) for reported deviations (one for each term as applicable; see detailed instructions for more information)

THERE WERE NO DEVIATIONS OF <u>ANY</u> OF THE TERMS AND CONDITIONS OF PART III OF THE TITLE V PERMIT FOR THE FOLLOWING LISTED EMISSIONS UNITS:		
Emissions Unit ID	Please place an ">X=" below if there were no Quarterly Deviations - If an ">X=" is not indicated, the deviation(s) must be identified in Table2 below	If applicable, please place an ">X=" below if there were no Semiannual Deviations - If an ">X=" is not indicated, the deviation(s) must be identified in Table2 below
P006 – Copper Calciner 1		
P009 – Rotary Calciner 4	X	
P010 – Rotary Calciner 1	X	
P018 – Wyssmont Dryer	X	
P026 – General Catalyst Pfaudler	X	
P070 – Copper Chrome Strike Deck	X	
P080 – Rotary Calciner 5	X	



Ohio Environmental Protection Agency  
Deviation Reporting

FACILITY NAME: BASF Corp.			
FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
FACILITY ADDRESS: 120 Pine Street, Elyria, OH 44035			
Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period (please indicate <input type="checkbox"/> N/A <input type="checkbox"/> below in the <input type="checkbox"/> From <input type="checkbox"/> and <input type="checkbox"/> To <input type="checkbox"/> fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

P086 – Gen Cat P&S Dryer 1	X	
P092 – Rotary Calciner 6	X	
P094 – Bldg. 10 Spin Flash Dryer	X	
P095 – Copper Calciner 2	X	
P099 – PK Blender Bldg. 10	X	
P102 – Rotary Calciner 2	X	
P103 – Rotary Calciner 3	X	
P106 – National Dryer	X	
P121 - Gen Cat P&S Dryer 2	X	
P122 - Gen Cat P&S Dryer 3	X	
P130 – P&S Dryer 6	X	

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Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period (please indicate <input type="checkbox"/> N/A <input checked="" type="checkbox"/> below in the <input type="checkbox"/> From <input checked="" type="checkbox"/> and <input type="checkbox"/> To <input checked="" type="checkbox"/> fields if this report does include semiannual deviation reporting)	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

P131 – Copper Tablet Precursor Process	X	
P132 – Powder Room	X	

Ohio Environmental Protection Agency  
Deviation Reporting

FACILITY NAME: BASF Corp.			
FACILITY ID (PREMISE NUMBER): 02-47-04-0195			
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Issuance or most recent modification date: 05/01/19		Includes PTI P0125759	
QUARTERLY Reporting Period		SEMIANNUAL Reporting Period	
From: 07/01/19	To: 09/30/19	From: NA	To: NA
Reporting deadline: 10/31/19			

**Section III - Part III Emissions Unit Terms and Conditions (Permit Requirement Reporting) - Deviation Reporting (Table2)**

Add rows as necessary to the following table for reported deviations (one for each Term as applicable; see detailed instructions for more information) - Please group deviations for each emissions unit that has deviations of multiple terms.

for each emissions unit that has deviations of multiple terms.

EMISSIONS UNIT (EU) NO./Description (See below)	TITLE V PERMIT TERM NO & Description	Reporting Requirement (choose one) or both		ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION INFORMATION		PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS THIS DEVIATION ATTRIBUTABLE TO A MALFUNCTION ? (Yes or No - If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT(S) DATE(S) (If no reports were made, state NO REPORTS@ in the space below)	MALFUNCTION WRITTEN REPORT(S) DATE(S) (If no reports were made, state NO REPORTS@ in the space below)	
		Quarterly	Semi- Annual		DEVIATION DURATION							DESCRIPTION AND MAGNITUDE OF THE DEVIATION
					DATE/TIME START	DATE/TIME END						
P006	C. 1. b) (1) f.	X		Visual check	09/06/19, 8:00 a.m.	09/06/19, 9:00 a.m.	Visible emissions – release of PM from P006-1 dust collector	Minor damage to one cartridge in the dust collector	Feed to calciner shut down, production activities ceased immediately upon discovery. All cartridges replaced.	YES	09/06/19	09/27/19

**ALL DETAILED INSTRUCTIONS FOR COMPLETING A DEVIATION REPORTING TABLE@** for guidance on this table.

*Potential Deviations* for July 1, 2019 to September 30, 2019 reporting in accordance with the following instructions.

Please note that the Elyria site recently entered into a consent agreement with EPA Region V that requires it to convert its additional operations management software into a real-time environmental monitoring and recordkeeping system. As part of this transition, the site has begun to gather and review data that reflects certain Title V permit parameters, but because the transition is not yet complete, the site cannot yet determine whether any deviations recorded in this system reflect violations of permit terms or are attributable to some other cause. Until the new system is in place, EPA Region V advised us to submit this information as follows:

"Under its Title V permit BASF must report violations, which means determining whether indicated potential violations are actual violations. EPA's acceptance of BASF's proposed Environmental Management System (EMS) to resolve BASF's ongoing compliance issues through the Administrative Consent Order (ACO) in this matter requires this functionality. See ACO, paragraph 44. BASF has up to 12 months from the ACO's effective date to demonstrate compliance with the CAA and relevant permits. Ibid. Until BASF's EMS has this functionality, BASF should therefore continue to base its Title V reports on the observations and paper records required by the Title V permit. But in the interim, BASF should also include and appropriately label in its Title V reports potential deviations appearing in the Wonderware data."

Pursuant to EPA's instructions, we are basing our Title V reports on the paper records required by the Title V permit, but we are also including deviations reflected in the Wonderware data, labeled as "potential deviations."

Unit ID	Source	Air Pollution Control Device	Monitoring Requirements	Deviations
P006	Copper Calciner 1 (E-10)	Main Draft Dust Collector	Pressure drop (0.1-5" WC)	9
P010	Rotary Calciner #1 (E-14)	Dust Collector #1	Baghouse Pressure drop (0.1-5"WC)	1
P010	Rotary Calciner #1 (E-14)	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P018	Wyssmont Drier (E-22)	Baghouse	Baghouse pressure drop (2-7"WC)	1
P070	CU/CR Strike Tanks (E-77)	Dust collector	Pressure drop (0.1-5"WC)	13
P080	Rotary Calciner #5 (E-13)	Dust Collector 5A	Pressure drop (0.1-5"WC)	25
P092	Rotary Calciner #6	Dust Collector #6	Pressure drop (0.1-5"WC)	5
P092	Rotary Calciner #6	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	23
P095	Copper Calciner #2 (E-101)	Main Draft Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P095	Copper Calciner #2 (E-101)	Feed Hopper Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P095	Copper Calciner #2 (E-101)	Discharge Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P099	PK Blender #2 (E-103)	Bldg. 9 Dust Collector	Baghouse Pressure drop (0.1-5"WC)	1
P102	Rotary Calciner #2	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P103	Rotary Calciner #3	Dust Collector #3	Baghouse Pressure drop (0.1-5"WC)	1

P103	Rotary Calciner #3	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P122	P&S Dryer #3	Dust Collector #3	Baghouse pressure drop (0.1-5"WC)	2
P130	#6 P&S Dryer	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	30
TriMer	Trimer Scrubber	Trimer Stage #2 Recirculation Flow	Flow >50 gpm	1
TriMer	Trimer Scrubber	Trimer Stage #3 Recirculation Flow	Flow >50 gpm	1
Viron 2	Viron Scrubber 2	Pressure Drop Across Scrubber	Pressure Drop Across Scrubber (0.5-12"WC), Scrubber Pump Flow, east and west (flow>2 gpm)	11
Viron 3	Viron Scrubber 3	Pressure Drop Across Scrubber	Pressure Drop Across Scrubber (0.5-12"WC), Scrubber Pump Flow, east and west (flow>2 gpm)	7

Potential Deviations for July 1, 2019 to September 30, 2019 reporting in accordance with the following instructions.

Please note that the Elyria site recently entered into a consent agreement with EPA Region V that requires it to convert its additional operations management software into a real-time environmental monitoring and recordkeeping system. As part of this transition, the site has begun to gather and review data that reflects certain Title V permit parameters, but because the transition is not yet complete, the site cannot yet determine whether any deviations recorded in this system reflect violations of permit terms or are attributable to some other cause. Until the new system is in place, EPA Region V advised us to submit this information as follows:

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Pursuant to EPA's instructions, we are basing our Title V reports on the paper records required by the Title V permit, but we are also including deviations reflected in the Wonderware data, labeled as "potential deviations."

Unit ID	Source	Air Pollution Control Device	Monitoring Requirements	Deviations
P006	Copper Calciner 1 (E-10)	Main Draft Dust Collector	Pressure drop (0.1-5" WC)	9
P010	Rotary Calciner #1 (E-14)	Dust Collector #1	Baghouse Pressure drop (0.1-5"WC)	1
P010	Rotary Calciner #1 (E-14)	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P018	Wyssmont Drier (E-22)	Baghouse	Baghouse pressure drop (2-7"WC)	1
P070	CU/CR Strike Tanks (E-77)	Dust collector	Pressure drop (0.1-5"WC)	13
P080	Rotary Calciner #5 (E-13)	Dust Collector 5A	Pressure drop (0.1-5"WC)	25
P092	Rotary Calciner #6	Dust Collector #6	Pressure drop (0.1-5"WC)	5
P092	Rotary Calciner #6	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	23
P095	Copper Calciner #2 (E-101)	Main Draft Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P095	Copper Calciner #2 (E-101)	Feed Hopper Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P095	Copper Calciner #2 (E-101)	Discharge Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P099	PK Blender #2 (E-103)	Bldg. 9 Dust Collector	Baghouse Pressure drop (0.1-5"WC)	1
P102	Rotary Calciner #2	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P103	Rotary Calciner #3	Dust Collector #3	Baghouse Pressure drop (0.1-5"WC)	1

P103	Rotary Calciner #3	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P122	P&S Dryer #3	Dust Collector #3	Baghouse pressure drop (0.1-5"WC)	2
P130	#6 P&S Dryer	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	30
TriMer	Trimer Scrubber	Trimer Stage #2 Recirculation Flow	Flow >50 gpm	1
TriMer	Trimer Scrubber	Trimer Stage #3 Recirculation Flow	Flow >50 gpm	1
Viron 2	Viron Scrubber 2	Pressure Drop Across Scrubber	Pressure Drop Across Scrubber (0.5-12"WC), Scrubber Pump Flow, east and west (flow>2 gpm)	11
Viron 3	Viron Scrubber 3	Pressure Drop Across Scrubber	Pressure Drop Across Scrubber (0.5-12"WC), Scrubber Pump Flow, east and west (flow>2 gpm)	7